

Exhibit A



Deposition of:
Doris Singleton-Jones

February 3, 2017

In the Matter of:

**In Re: Bard IVC Filters Products
Liability**

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF ARIZONA
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5 In re Bard IVC Filters Products
6 Liability Litigation
7
8

9 NO. MD-15-02641
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11

12 PHX-DGC
13
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15 DEPOSITION OF
16 DORIS SINGLETON-JONES
17 February 3, 2017 - 8:05 a.m.
18 Ellis, Painter, Ratterree & Adams
19 2 E. Bryan Street
20 Savannah, Georgia
21 Deborah K. Lingonis, RPR, CCR 2883
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1 A. Until the prescription ran out. I had to take
2 them, you know, yeah, until the prescription ran out.

3 Q. And do you recall how long the prescriptions
4 lasted for? And you can give me a ballpark. Months,
5 years, just a couple of weeks.

6 A. About months.

7 Q. Months. Okay.

8 A. Yeah.

9 Q. Do you have any history of drug or alcohol
10 problems?

11 A. No.

12 Q. How often do you drink on a weekly basis?

13 A. I don't.

14 Q. How about smoking?

15 A. Smoking, yeah. Me and my husband share
16 cigarettes, so it's like an every now and then thing.
17 We don't smoke, you know, smoke a pack. And that's
18 about it. Me and him share.

19 Q. How often do you get through a pack of
20 cigarettes between the two of you?

21 A. About three days. It takes us about three
22 days.

23 Q. Have you been diagnosed with any degenerative
24 conditions?

25 A. No.